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U.S. DISTRICT COURT E.D.N.Y.
★ MAY 16 2014 ★
BROOKLYN OFFICE

TM:SD
F.#2014R00528

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

RODNEY FEQUIERE,

Defendant.

INDICTMENT

CR 14 - 00293
Cr. No. _____
(T. 18, U.S.C., §§ 1591(a)(1),
1591(a)(2), 1591(b)(2),
1594(d)(1), 1594(d)(2),
1952(a)(3)(A), 2422(a),
2423(a), 2428(a), 2 and 3551
et seq.; T. 21, U.S.C., § 853(p))

-----X

THE GRAND JURY CHARGES:

CHEN, J.

LEVY, M.J.

COUNT ONE

(Sex Trafficking of a Child)

1. In or about and between June 2012 and July 2013, within the Eastern District of New York and elsewhere, the defendant RODNEY FEQUIERE, together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe, an individual whose identity is known to the Grand Jury and who had not attained the age of 18 years, and did benefit, financially and by receiving things of value from participation in a venture that recruited, enticed, harbored, transported, provided, obtained and maintained Jane Doe, in and affecting interstate commerce, knowing, and in

reckless disregard of the fact, that Jane Doe had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts.

(Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(2), 2 and 3551 et seq.)

COUNT TWO
(Interstate Travel in Aid of Prostitution)

2. In or about October 2012, within the Eastern District of New York and elsewhere, the defendant RODNEY FEQUIERE, together with others, did knowingly and intentionally travel in interstate commerce with intent to promote, manage, establish and carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, to wit: Promoting Prostitution in the Third Degree, in violation of New York Penal Law Sections 230.25(2) and 20.00, and thereafter did promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of such unlawful activity.

(Title 18, United States Code, Sections 1952(a)(3)(A), 2 and 3551 et seq.)

COUNT THREE
(Interstate Prostitution)

3. In or about October 2012, within the Eastern District of New York and elsewhere, the defendant RODNEY FEQUIERE, together with others, did knowingly and intentionally persuade, induce, entice and coerce one or more individuals to travel in interstate commerce to engage in prostitution.

(Title 18, United States Code, Sections 2422(a), 2 and 3551 et seq.)

COUNT FOUR
(Interstate Prostitution of a Child)

4. In or about October 2012, within the Eastern District of New York and elsewhere, the defendant RODNEY FEQUIERE, together with others, did knowingly and intentionally transport Jane Doe, an individual who had not attained the age of 18 years, in interstate commerce, to wit: from Brooklyn, New York to Florida, with intent that Jane Doe engage in prostitution.

(Title 18, United States Code, Sections 2423(a), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
FOR COUNTS ONE AND TWO

5. The United States hereby gives notice to the defendant that, upon his conviction of either offense charged in Counts One or Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d), of any property, real or personal, that was used or intended to be used to commit, or to facilitate the commission of such offenses, and any property, real or personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of such violations.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value;

or

e. has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 1594(d)(1) and 1594(d)(2); Title 21, United States Code, Section 853(p))

**CRIMINAL FORFEITURE ALLEGATION
FOR COUNTS THREE AND FOUR**

7. The United States hereby gives notice to the defendant that, upon his conviction of either offense charged in Counts Three or Four, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2428(a), of any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violations, and any property, real or personal, obtained, directly or indirectly, as a result of such violations.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

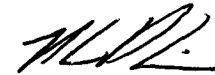
d. has been substantially diminished in value;

or

e. has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2428(a); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON



LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2014R00528
FORM DBD-34 JUN. 85

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

RODNEY FEQUIERE,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 1591(a)(1), 1591(a)(2), 1591(b)(2), 1594(d)(1),
1594,(d)(2), 1952(a)(3)(A), 2422(a), 2423(a), 2428(a), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p))

A true bill.

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20____

Clerk

Bail, \$ _____

Soumya Dayananda, Assistant U.S. Attorney (718) 254-7996